UNITED	STATES	S DISTRI	CT CC)URT
EASTER'	N DISTR	UCT OF	NEW	YORK

JULIANA SARAH STRAEHLE,

Plaintiff,

ANSWER

- against -

Index No. 13-cv-4601

F.E.G.S.; JOSEPH STEIN JR., as Chairman of F.E.G.S.; ROBERT O. LEHRMAN, et al., as Members of the Board of F.E.G.S.; GAIL MAGALIFF, as Chief Executive Officer of F.E.G.S.; STUART OLTCHICK, as President of F.E.G.S.; PEG MORAN as Senior Vice President of F.E.G.S.-Residential & Housing Operations; KATHY ROSENTHAL, as Senior Vice President of F.E.G.S. - Long Island Regional Operations; ROBERT GREENBERGER, as Vice President of F.E.G.S. - Long Island Regional Operations; BRYAN CAULFIELD, as Vice President of F.E.G.S.-Facilities & Real Estate; DAN CONNORS, as Vice President of F.E.G.S. -Supported Apartment Program; MELANIE GERMAIN, as Regional Director of F.E.G.S. -Residential & Housing; JOANNE HECKMANN, as Director of F.E.G.S.-Residential & Housing; and TASHIA KING, as Manager of F.E.G.S. -Residential and Housing; severally and together,

Deten	dants.
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Defendant, F.E.G.S., by its attorneys, AARONSON RAPPAPORT FEINSTEIN & DEUTSCH, LLP, as and for its Answer to plaintiff's Complaint, respectfully shows to this Court and alleges upon information and belief:

1. Denies the allegations contained in the first two unnumbered paragraphs in plaintiff's complaint.

JURISDICTION

2. Denies all numbered allegations except admits this court lacks diversity jurisdiction and otherwise begs leave to refer all questions of law to the court.

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THE PARTIES

- 3. Denies the knowledge or information sufficient to form a belief as to the truth of allegations contained in paragraph(s) "1", "2" and "7".
- 4. Denies the allegations contained in paragraph(s) "3", "4" and "6" except admits that F.E.G.S. is a Not For Profit Corporation who employs the individually named defendants and otherwise begs leave to refer all questions of law to the court.

THE DISPUTE

- 5. Denies the allegations contained in paragraph(s) "8", "9", "10", "12", "17", "18", "21", "22" and "23".
- 6. Denies the knowledge or information sufficient to form a belief as to the truth of allegations contained in paragraph(s) "11", "13", "14", "15", "16", "19" and "20".

THE CLAIMS

7. Denies the allegations contained in paragraph(s) "24", "25", "26", "27", "28", "29", "30", "31", "32" and "33".

THE URGENCY

8. Denies the allegations contained in paragraph(s) "34" and "35".

STANDING

9. Denies the allegations contained in paragraph(s) "36".

RELIEF SOUGHT

10. Denies the allegations contained in paragraph(s) "37", "38", "39", "40", "41", "42" and "43".

AS AND FOR THE FIRST AFFIRMATIVE DEFENSE

11. This court is without subject matter jurisdiction.

AS AND FOR THE SECOND AFFIRMATIVE DEFENSE

12. This court lacks jurisdiction over the person of this defendant.

AS AND FOR THE THIRD AFFIRMATIVE DEFENSE

13. Plaintiff is not an "aggrieved" person within the meaning of 42 USC 3602(i)(1) or (2).

AS AND FOR THE FOURTH AFFIRMATIVE DEFENSE

14. The answering defendant is not a "state actor" within the meaning of 42 USC 1983.

AS AND FOR THE FIFTH AFFIRMATIVE DEFENSE

15. This answering defendant, at all times here relevant, acted in good faith

AS AND FOR THE SIXTH AFFIRMATIVE DEFENSE

16. This answering defendant, at all times here relevantly acted without discriminating intent.

WHEREFORE, defendant, F.E.G.S., demands judgment dismissing the Complaint, together with the costs and disbursements of the within action.

Dated:

New York, New York

November 22, 2013

Yours Letc..

BY: Steven C. Mandell (0583)

AARONSON RAPPAPORT FEINSTEIN

& DEUTSCH, LLP

Attorneys for Defendants

F.E.G.S.

Office & P.O. Address

600 Third Avenue

New York, New York 10016

Tel.: (212) 593-6700

AFFIDAVIT OF SERVICE BY MAIL

STATE OF NEW YORK

ss.:

COUNTY OF NEW YORK)

Madelynne L. Day, being duly sworn, deposes and says: that deponent is not a party to the action, is over 18 years of age and resides at Queens County, New York.

That on the 22nd day of November, 2013, deponent served the within ANSWER (for F.E.G.S.) upon:

TO: JULIANA SARAH STRAEHLE

Plaintiff Pro Se 257 Anchor Way

Uniondale, New York 11553

at the address designated by said attorney(s) for that purpose by depositing a true copy of same enclosed in a postpaid, properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Post Office within the State of New York.

Madelynne

Sworn to before me this

22nd day of November, 2013.

Notary Public

STEVEN C. MANDELL

Notary Public, State of New York Rockland County

LIC. #02MA7691635

Commission Expires November 30, 2014

United States District Court Eastern District of New York

13-cv-4601

JULIANA SARAH STRAEHLE,

Plaintiff.

- against -

F.E.G.S.; JOSEPH STEIN JR., as Chairman of F.E.G.S.; ROBERT O. LEHRMAN, et al., as Members of the Board of F.E.G.S.; GAIL MAGALIFF, as Chief Executive Officer of F.E.G.S.; STUART OLTCHICK, as President of F.E.G.S.; PEG MORAN as Senior Vice President of F.E.G.S.-Residential & Housing Operations; KATHY ROSENTHAL, as Senior Vice President of F.E.G.S. - Long Island Regional Operations; ROBERT GREENBERGER, as Vice President of F.E.G.S. - Long Island Regional Operations; BRYAN CAULFIELD, as Vice President of F.E.G.S.-Facilities & Real Estate; DAN CONNORS, as Vice President of F.E.G.S. - Supported Apartment Program; MELANIE GERMAIN, as Regional Director of F.E.G.S. - Residential & Housing; JOANNE HECKMANN, as Director of F.E.G.S.-Residential & Housing; and TASHIA KING, as Manager of F.E.G.S. - Residential and Housing; severally and together,

Defendants.

ANSWER

AARONSON RAPPAPORT FEINSTEIN & DEUTSCH, LLP

Attorneys for Defendants
F.E.G.S., ROBERT O. LEHRMAN, STUART OLTCHICK, KATHY ROSENTHAL,
BRYAN CAULFIELD, MELANIE GERMAIN, JOSEPH STEIN, JR., GAIL MAGALIFF,
ROBET GREENBERGER, DAN CONNORS and JOANNE HECKMANN

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To: ALL PARTIES